UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF GEORGIA
GAINESVILLE DIVISION

MIGUEL HERNANDEZ

Petitioner,

vs.

DENNIS UDZINSKI, *in his official capacity as Warden of Hall County Jail*; and
LADEON FRANCIS, *ICE Atlanta Field Office Director*; and
TODD LYONS, *in his official capacity as Acting Director of Immigration and Customs Enforcement*; and
KRISTI NOEM, *Secretary of Homeland Security*
And PAMELA BONDI, *U.S. Attorney General.*

Respondents.

CASE NO.:
2:25-cv-00373-RWS

PETITIONER'S MOTION FOR COSTS, FEES, AND OTHER EXPENSES UNDER THE EQUAL ACCESS TO JUSTICE ACT

Petitioner moves, under the Equal Access to Justice Act (EAJA), 28 U.S.C. § 2412(d), for attorneys' fees incurred in his petition for writ of habeas corpus challenging his unlawful civil immigration detention by the Department of Homeland Security (DHS), Immigration and Customs Enforcement (ICE) at the Hall County Jail in Gainesville, Georgia and continued detention upon transfer to the Stewart Detention Center in Lumpkin, Georgia. This Court granted Petitioner's Motion for a Temporary Restraining Order and Preliminary Injunctive Relief relating to his petition for a writ of habeas corpus on November 24, 2025. *See* ECF No. 10. The Court also previously granted, in part, Petitioner's Motion for a Temporary Restraining Order on November 17, 2025. ECF No. 5.

Petitioner seeks an award of attorneys' fees and expenses under EAJA, as set forth below. As detailed in the accompanying memorandum, an award is mandatory because **Petitioner is the prevailing party in a civil action** for EAJA purposes; **the government's position was not substantially justified** and has been rejected by this Court and a near-unanimity of federal courts nationwide; and no special circumstances make an award unjust. Further, special factors, including counsel's specialized expertise in immigration federal court and habeas litigation and the limited availability of such counsel in Georgia, justify an enhanced fee award.

Petitioner's request is timely filed. A fee application must be filed within thirty (30) days of the final judgment. *See* 28 U.S.C. § 2412(d)(1)(B). A final judgment is a judgment that is no longer appealable, and a party has sixty (60) days from the date of the entry of judgment to file an appeal. Fed. R. App. P. 4(a); *Myers v. Sullivan*, 916 F.2d 659, 666 (11th Cir. 1990). Where, as here, the government appealed the district court decision and subsequently voluntarily dismissed the appeal, Petitioner must file a fee application within thirty (30) days of the final, not appealable dismissal order. *See* Fed. R. App. P. 4(a); *Myers*, 916 F.2d at 672. As the government voluntarily dismissed its appeal before the Eleventh Circuit Court of Appeals on February 24, 2026 (ECF No. 27), this fee application—filed within thirty (30) days of that date—is timely under EAJA.

Petitioner is an eligible party. Under 28 U.S.C. § 2412(d)(2)(B), an individual is an eligible party if his or her net worth did not exceed $2,000,000 at the time the civil action was filed. Petitioner meets this requirement. *See* Exhibit 1, Petitioner's Declaration. Contemporaneously with this motion, Petitioner submits an itemized statement from his counsel showing the actual time expended and the rates at which fees and costs are claimed, together with supporting declarations and documentation.

RELEVANT FACTS AND PROCEDURAL HISTORY

Petitioner assumes the Court's familiarity with the facts of the case but reiterates the procedural history briefly for purpose of demonstrating the work Petitioner's counsel conducted in the case. Petitioner filed his petition for writ of habeas corpus on November 16, 2025. ECF No. 1. Petitioner also filed a Motion for a Temporary Restraining Order (TRO) and Preliminary Injunctive Relief. ECF No. 2. The Court granted, in part, Petitioner's Motion for a Temporary Restraining Order on November 17, 2025. ECF No. 5. On November 20, 2025, Respondents filed their Opposition to Petitioner's TRO and PI, asserting that Petitioner's detention was lawful under 8 U.S.C. § 1225(b)(2)(A). ECF No. 9. On November 24, 2025, the Court granted Petitioner's TRO, found that Petitioner was not subject to detention under § 1225(b)(2)(A) and instead, under § 1226(a), was eligible for a bond hearing and ordered Respondents to provide Petitioner with a bond hearing no later than 72 hours from entry of the Order or otherwise release him from detention and provide a status report. ECF No. 10. The Court further enjoined Respondents from pursuing any detention of Petitioner under § 1225(b)(2)(A) and from rearresting Petitioner unless he committed a new violation of a federal, state or local law, or failed to attend his immigration proceedings. *Id.*

ARGUMENT

I. The Court Should Award Attorney Fees and Costs to Petitioner under EAJA.

The EAJA statute at 28 U.S.C. § 2412(d)(1)(A) dictates that, unless otherwise specifically provided for by statute, a "court shall award to a prevailing party other than the United States fees and other expenses ... incurred by that party in any civil action ... brought by or against the United States in any court having jurisdiction of that action, unless the court finds that the position of the United States was substantially justified or that special circumstances make an award unjust."[1] *Abdelgalel v. Holder*, 398 F. App'x 472, 476 (11th Cir. 2010); *Morillo-Cedron v. District Director, U.S. Citizenship & Immigration Servs.*, 452 F.3d 1254, 1258 (11th Cir. 2006); *Pichon v. Bisignano*, No. 1:24-CV-2855-AT, 2025 WL 3909470, at *1 (N.D. Ga. Nov. 24, 2025).

Petitioner is an eligible party under EAJA because he is a private individual whose net worth has never exceeded 2 million dollars. *See* Ex. 1 (Declaration of Miguel Hernandez Ramos ¶ 1; 28 U.S. Code § 2412(d)(2)(B) (defining "party" means (i) an individual whose net worth did not exceed $2,000,000 at the time the

[1] 28 U.S.C. § 2412(d)(1)(A) states: Except as otherwise specifically provided by statute, a court shall award to a prevailing party other than the United States fees and other expenses, in addition to any costs awarded pursuant to subsection (a), incurred by that party in any civil action (other than cases sounding in tort), including proceedings for judicial review of agency action, brought by or against the United States in any court having jurisdiction of that action, unless the court finds that the position of the United States was substantially justified or that special circumstances make an award unjust.

civil action was filed). In short, absent a showing by the government that its position was "substantially justified or that special circumstances make an award unjust," the award of fees and expenses to the "prevailing party" is mandatory, since 28 U.S.C. § 2412(d)(1)(A) uses the language "shall award."

II. Petitioner is the Prevailing Party. The Court Granted his Habeas Petition and Ordered the Government to Provide Him with a Bond Hearing.

To obtain an award of attorneys' fees and expenses under EAJA, Petitioner must demonstrate that he was the "prevailing party." 28 U.S.C. § 2412(d)(1)(A). According to the Supreme Court, "a 'prevailing party' is one who has been awarded some relief by a court" and who has obtained a "court-ordered change in the legal relationship" between the parties. *Buckhannon Bd. & Care Home Inc., v. West Virginia Dep't of Health and Human Res.*, 532 U.S. 598, 603-605 (2001) ("enforceable judgments on the merits [ ] create 'the material alteration of the legal relationship of the parties' necessary to permit an award of attorney's fees."); *Rhoten v. Bowen*, 854 F.2d 667, 669 (4th Cir. 1988) (Litigants are considered "prevailing parties" under the EAJA "if they succeed on any significant issue in litigation which achieves some of the benefit the parties sought in bringing suit."); *see also Morillo-Cedron v. U.S. Citizenship and Immigration*, 452 F.3d 1254, 1257 (11th Cir. 2006); *Abdelgalel v. Holder*, 398 F. App'x 472, 476 (11th Cir. 2010); *Am. Disability Ass'n, Inc. v. Chmielarz*, 289 F.3d 1315, 1319 (11th Cir. 2002).

Petitioner bears the burden of proving that he is the prevailing party and eligible to receive an award. 28 U.S.C. § 2412(d)(1)(B); *Scarborough v. Principi*, 541 U.S. 401, 414 (2004). The burden then shifts to the government to demonstrate that its position was substantially justified or that special circumstances make an award unjust. 28 U.S.C. § 2412(d)(1)(A)); *Duncan v. Bisignano*, No. CV424-191, 2025 WL 2233981, at *1 (S.D. Ga. Aug. 6, 2025); *Stratton v. Bowen*, 827 F.2d 1447, 1450 (11th Cir. 1987) ("The government bears the burden of showing that its position was substantially justified").

Petitioner is a prevailing party because he has achieved a "material alteration of the legal relationship of the parties" and that alteration was "judicially sanctioned." *Buckhannon Bd. & Care Home, Inc. v. W. Va. Dep't of Health & Human Res.*, 532 U.S. 598, 604–05 (2001); *see also Walker v. City of Mesquite, Tex.*, 313 F.3d 246, 249 (5th Cir. 2002).

In this case, over the government's opposition, the Court agreed with Petitioner's position that he was not subject to mandatory detention under 8 U.S.C. § 1225, as an arriving alien 'seeking admission.' ECF No. 10. The Court found that "nothing in the text of § 1226(a) prevents it from applying to all noncitizens already present in the country." *Id.* at 7. It further held that Respondents proposed interpretation—that the term "seeking admission" and "applicant for admission" mean the same thing—"disregards the plain meaning of §1225(b)(2)(A), violates

multiple canons of statutory construction, and runs counter to the weight of the caselaw." *Id.* at 9-10. The Court cited the rationales in *J.A.M. v. Streeval*, No. 4:25-cv-342-CDL, 2025 WL 3050094 (M.D. Ga. Nov. 1, 2025) and *Martinez v. Hyde*, 2025 WL 2084238, at *6 (D. Mass. July 24, 2025) ("the phrase 'seeking admission' is undefined in the statute but necessarily implies some sort of present-tense action.") and *Lepe v. Andrews*, 2025 WL 2716910, at *5 (E.D. Cal. Sept. 23, 2025) ("Seeking" means "asking for" or "trying to acquire or gain" and implies some kind of affirmative action.). *Id.* The Court highlighted that "Section 1225 'repeatedly refers' to noncitizens actively entering the country's border and does not refer to noncitizens already living here." *Id.* at 12. Accordingly, the Court found "that Petitioner has clearly shown a substantial likelihood on the merits of his claim that Respondents have unlawfully detained him without bond under§ 1225(b)(2)(A)" and noted that it thus "need not address Petitioner's claim that his detention also violates due process." *Id.* at 14.

As such, in granting Petitioner's TRO and PI relief, the Court enjoined Respondents from continuing to detain Petitioner unless they provide him with an individualized bond hearing pursuant to 8 U.S.C. § 1226(a) as soon as possible, but no later than seventy-two (72) hours from the entry of this Order" and ordered that if Respondents failed to do so, then they must release Petitioner "from

detention no later than the seventy-third (73rd) hour after the entry of this Order." *Id.* at 17.

Thus, this Court's November 24, 2025 Order conferred prevailing party status on Petitioner. *See e.g., W.M.V.C. v. Barr*, 926 F.3d 202, 208 n.2 (5th Cir. 2019) ("Because petitioners sought a remand to the BIA, our decision to grant such relief . . . entitles petitioners to prevailing party status."); *Watkins v. Mobile Housing Board*, 632 F.2d 565, 567 (5th Cir. Unit B 1980) (The prevailing party test is "whether he or she has received substantially the relief requested or has been successful on the central issue"); *Robinson v. Kimbrough*, 652 F.2d 458, 465 (5th Cir. 1981) (Plaintiffs prevailed where their "lawsuit was a catalyst motivating defendants to provide the primary relief sought in a manner desired by litigation."); *Jean v. Nelson*, 863 F.2d 759, 765 (11th Cir. 1988), aff'd sub nom. *Comm'r, I.N.S. v. Jean*, 496 U.S. 154, 110 S. Ct. 2316 (1990) (plaintiffs prevailed where he district court ruled that INS had violated the APA by failing to engage in formal rulemaking before revising its policy of paroling applicants for asylum); *Townson v. Garland*, No. CV 1:22-00251-KD-N, 2024 WL 3363850, at *1 (S.D. Ala. July 10, 2024) (finding plaintiff was the prevailing party where district court set aside the ATF's denial of his federal

firearms license as not authorized and remanding the matter back to the ATF for further proceedings consistent with the ruling).

III. The Government's Position Was Not Substantially Justified.

The government's position in this case was not "substantially justified." 28 U.S.C. § 2412(d)(1)(A). Congress placed a heavy burden of proof on the government to demonstrate that its position was substantially justified. H.R. Rep. No. 96-1418, 96th Cong., 2d Sess. 10, 13-14 (1980) ("[T]he strong deterrents to contesting government action require that the burden of proof rest with the government."). To meet this burden, the government must show that its position had a reasonable basis both in law and in fact. *Pierce, Secretary of HUD v. Underwood et al.*, 487 U.S. 552, 566 n.2 (1988); *Dantran v. U.S. Dept. of Labor*, 246 F.3d 36, 41 (1st Cir. 2001) ("To satisfy its burden, the government must justify not only its pre-litigation conduct but also its position throughout litigation.").

Under the EAJA, the "position of the United States" encompasses both "the position taken by the United States in the civil action" and "the action or failure to act by the agency upon which the civil action is based." *Nkenglefac v. Garland*, 64 F.4th 251, 253 (5th Cir. 2023)[2] (finding government's position not substantially justified where the underlying BIA and IJ decisions contravened circuit

[2] Quoting *W.M.V.C.*, 926 F.3d at 209-10 (quoting *Baker v. Bowen*, 839 F.2d 1075, 1080 (5th Cir. 1988); *Herron v. Bowen*, 788 F.2d 1127, 1130 (5th Cir. 1986).

precedent). Thus, "unreasonable agency action at any level entitles the litigant to EAJA fees," regardless of whether the government's litigation arguments were themselves reasonable. *Li v. Keisler*, 505 F.3d 913, 919 (9th Cir. 2007) (Because Congress intended for EAJA to be a deterrent for unreasonable agency conduct, regardless of whether the government's conduct in the federal court proceedings is substantially justified, "unreasonable agency action at any level entitles the litigant to EAJA fees."). If the government cannot show both positions were substantially justified, the Court must award fees.

The government's position here does not meet the test for substantial justification and would not have satisfied a reasonable person. Indeed, the Court pointed out how Respondents' position conflated terms, violated several cannons of statutory interpretation, and that "virtually all courts have rejected Respondents' argument for a multitude of reasons." ECF No. 10 at 11-12.

Additionally, as the Court noted, the majority of district courts across the country that have considered the government's new statutory interpretation have found it incorrect and unlawful. *See Barco Mercado v. Francis*, -- F. Supp. 3d --, 2025 WL 3295903, at *4 (S.D.N.Y. Nov. 26, 2025) (rejecting Respondents' position and noting that "the overwhelming, lopsided majority [of district courts] have held that the law still means what it always has meant.") (footnotes omitted). As another district court recently held, "this sweeping new policy, which the

Department of Homeland Security (DHS), in conjunction with the Department of Justice (DOJ), adopted on a nationwide basis on July 8, 2025, subjects millions of undocumented residents to prolonged detention without the opportunity for release on bond, in contravention of decades of agency practice and robust due process protections hitherto afforded to such residents under 8 U.S.C. § 1226(a). *Cabrera-Cortes v. Knight*, No. 2:25-CV-01976, 2025 WL 3240971, at *1 (D. Nev. Nov. 20, 2025); *see Vashishth Tyagi v. Luis Soto et al.*, No. 26-CV-00962, 2026 WL 478184, at *1 (D.N.J. Feb. 20, 2026) ("[F]ederal courts have in near unanimity similarly rejected respondents' position in approximately 300 cases to date, a number which climbs with every passing day.") citing *e.g., Demirel v. Fed. Det. Ctr. Phila.*, No. 25-cv-05488, 2025 WL 3218243, at *4 (E.D. Pa. Nov. 18, 2025) (noting "the law is clear" and that "of the 288 district court decisions to address the issue, 282 have determined that § 1226(a) applies or likely applies in situations similar to those presented here. Those decisions are plainly correct.").

Clearly, the government's position was not reasonable or substantially justified. Notably, several district courts have specifically stated as much and awarded similarly situated petitioners costs and fees under EAJA. For example, a district court in the Southern District of New York in a similar civil habeas action challenging the government's position on § 1225, found the petitioner was the prevailing party, concluded that government's position was not substantially

justified, and awarded EAJA. *See Barco Mercado v. Francis*, 2025 WL 3295903, at *13 ("Respondents' position does not and has never had a reasonable basis in statutory text, structure, or history. Their position has been rejected with near unanimity in the overwhelming majority of cases across the country. Mr. Barco is entitled to reasonable fees and costs.); *see Yao v. Almodovar*, No. 25 CIV. 9982 (PAE), 2025 WL 3653433, at *12 (S.D.N.Y. Dec. 17, 2025) (finding that 1) habeas petitions challenging immigration detention are civil actions within the meaning of the EAJA, 2) Yao was the prevailing party, 3) "ICE's position, rejected this year in some 97% of the cases in which it was litigated, was not substantially justified" and 4) Yao was thus entitled to reasonable fees and costs); *Rivera Esperanza v. Francis*, No. 25-CV-8727, 2025 WL 3513983, at *9 (S.D.N.Y. Dec. 8, 2025) (finding petitioner was the prevailing party and the government's position was not substantially justified on the same issue).

IV. No Special Circumstances That Would Make an Award Unjust.

Absent a showing that its position was substantially justified, the government can only avoid paying a prevailing party's attorneys' fees and expenses if it can show that special circumstances would make such an award unjust. 28 U.S.C. §2412(d)(1)(A). This provision "should be narrowly construed so as not to interfere with the congressional purpose" in passing statutes such as EAJA. *Martin v. Heckler*, 773 F.2d 1145, 1150 (11th Cir. 1985). Furthermore,

"Defendants bear the burden of proving the existence of special circumstances." *Id.* There are no special circumstances in this case, however, that would make it unjust to award Petitioner attorneys' fees and costs incurred in this litigation. In fact, it would be unjust if Petitioner were not awarded attorneys' fees and costs necessarily incurred in order to protect and maintain his family unit, given that the litigation was a direct result of Respondents' unlawful detention, depriving him of his right to liberty and causing family separation and hardship.

V. Fees and Other Expenses to be Awarded to Petitioner.

EAJA provides for the recovery of fees and other expenses, as well as costs. 28 U.S.C. §§ 2412(a), (d)(1)(A). The amount to be awarded for work performed (*e.g.* attorneys' fees) is based upon "prevailing market rates for the kind and quality of the services furnished, except . . . attorney fees shall not be awarded in excess of $125 per hour unless the court determines that an increase in the cost of living or a special factor, such as the limited availability of qualified attorneys for the proceedings involved, justifies a higher fee." 28 U.S.C. § 2412(d)(2)(A). Petitioner emphasizes that while many attorneys may file such cases, there is a verified scarcity of counsel possessing the specific, high-level expertise required to litigate these matters effectively and expeditiously. As such, counsel's rates reflect her expertise and experience. Lead counsel was responsible for the core legal strategy, primary brief drafting, and oral argument, justifying the highest requested rate,

while other attorneys who assisted with research and discrete drafting tasks are billed at rates commensurate with their respective experience and contributions.

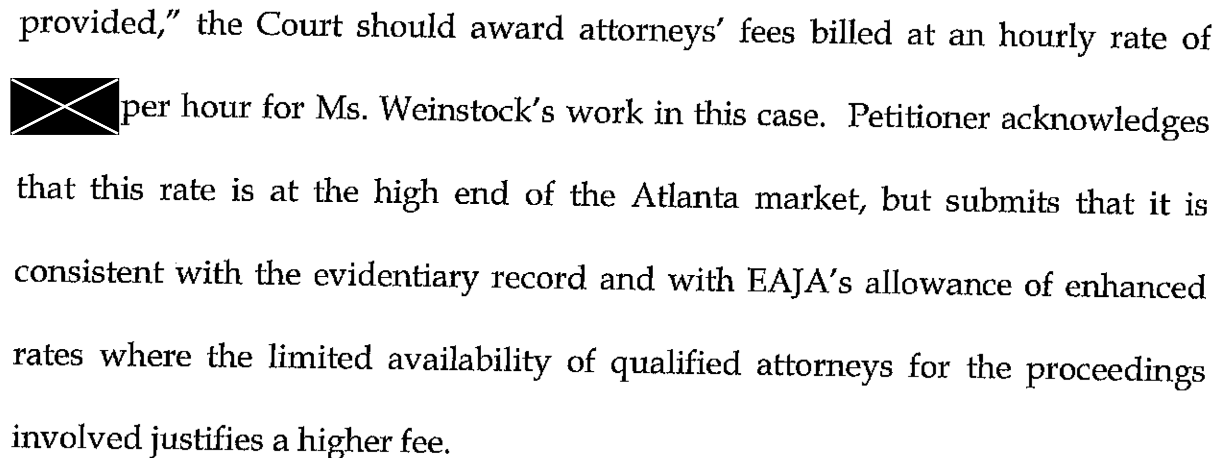
A. <u>The prevailing market rate is above the $125/hour statutory rate.</u>

This action was filed in the Northern District of Georgia. The relevant market for purposes of determining a reasonable hourly rate is therefore the Atlanta legal market within Georgia. Enclosed as Exhibits 2–5 is evidence that the prevailing market rate for complex federal immigration habeas litigation by highly experienced counsel in the Atlanta legal market is between $650 and $1,000 per hour. Attorney Karen Weinstock attests that she has been licensed since 1999, has approximately 24 years of exclusive immigration-law experience, devotes 100% of her practice to immigration and federal immigration litigation, and normally charges [redacted] per hour for high-level corporate immigration work, but that at least [redacted] per hour is warranted for specialized, urgent federal court immigration litigation such as this case. Attorney Marshall Cohen, with 35 years of immigration practice including detention, removal defense, and related federal litigation, states that he charges [redacted] per hour for ordinary immigration matters and [redacted] per hour for comparable complex habeas litigation. Ex. 5. Attorney Jessie Calmes, who has ten years of immigration-law experience, explains that she charges [redacted] per hour for normal immigration work and [redacted] per hour for similar complex federal habeas cases. Ex. 3. Attorney Eszter Bardi, with eleven years of

immigration-law experience, charges [redacted] per hour for standard matters and [redacted] per hour for comparable federal habeas litigation. Ex. 4. All these declarants opine that, given Ms. Weinstock's 24 years of immigration experience and rare depth of federal habeas expertise, a [redacted] hourly rate for her work in this litigation is reasonable and consistent with prevailing market rates in Georgia for complex civil detention and constitutional litigation.

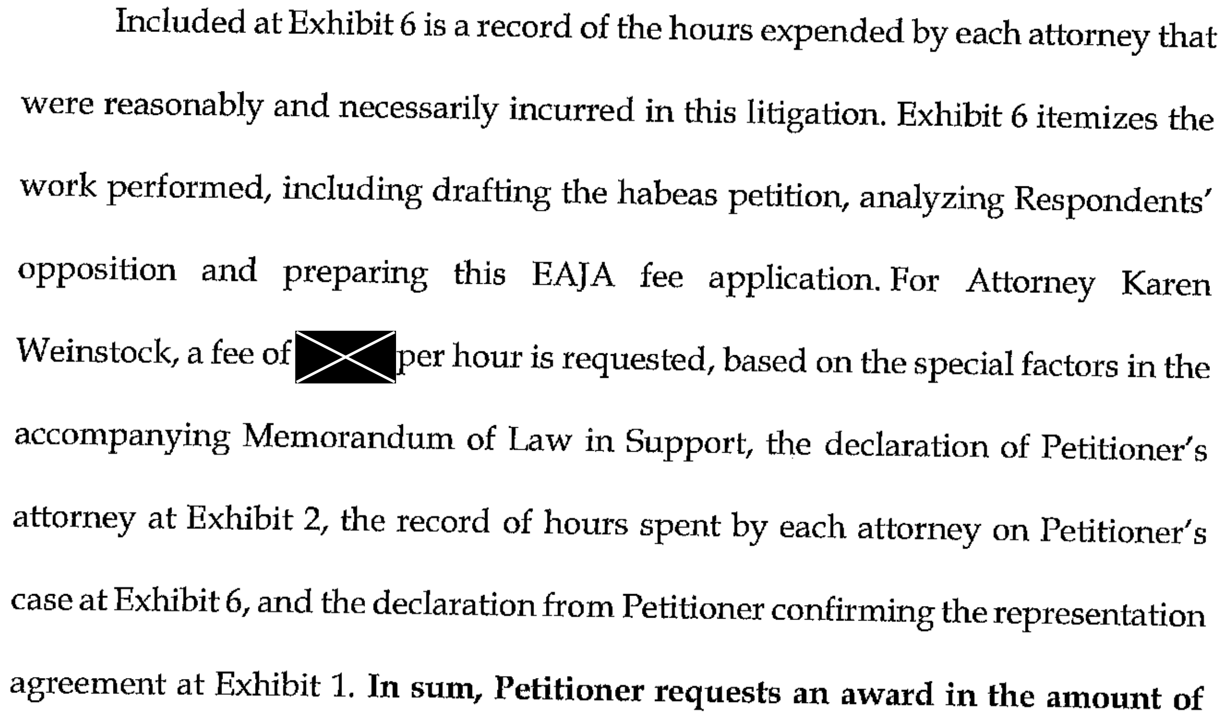
According to these attorneys, whose experience well qualifies them to comment on the prevailing market rates in the Atlanta area where they all practice immigration law, the prevailing market rate for an immigration attorney of over twenty (20) years' experience, such as Karen Weinstock, is between $800 and $1000 per hour. *Id.* Indeed, Attorney Cohen charges an hourly rate of [redacted] for normal immigration work. However, to handle similar complex federal habeas litigation, he charges an hourly rate of [redacted] Ex. 6. Attorney Calmes and Bardi charge [redacted]/hour, [redacted]/hour, and [redacted]/hour respectively for similar complex federal habeas litigation and all have significantly less experience than Ms. Weinstock. Exs.3-4. All of these attorneys all stated that an hourly rate of [redacted] is reasonable for an attorney with Ms. Weinstock's background and experience and for the quality of the service provided to Petitioner. *Id.*

Therefore, with the prevailing market rate being significantly higher than the statutory amount of $125 per hour for the "kind and quality of service



provided," the Court should award attorneys' fees billed at an hourly rate of [redacted] per hour for Ms. Weinstock's work in this case. Petitioner acknowledges that this rate is at the high end of the Atlanta market, but submits that it is consistent with the evidentiary record and with EAJA's allowance of enhanced rates where the limited availability of qualified attorneys for the proceedings involved justifies a higher fee.

B. Hours Expended



Included at Exhibit 6 is a record of the hours expended by each attorney that were reasonably and necessarily incurred in this litigation. Exhibit 6 itemizes the work performed, including drafting the habeas petition, analyzing Respondents' opposition and preparing this EAJA fee application. For Attorney Karen Weinstock, a fee of [redacted] per hour is requested, based on the special factors in the accompanying Memorandum of Law in Support, the declaration of Petitioner's attorney at Exhibit 2, the record of hours spent by each attorney on Petitioner's case at Exhibit 6, and the declaration from Petitioner confirming the representation agreement at Exhibit 1. **In sum, Petitioner requests an award in the amount of**

Related, attorney fees are available under EAJA for hours spent on the fee application. *Commissioner, INS*, 496 U.S. at 163-166 (1990). All hours spent on this case are set out in the attached time records, and include hours spent preparing

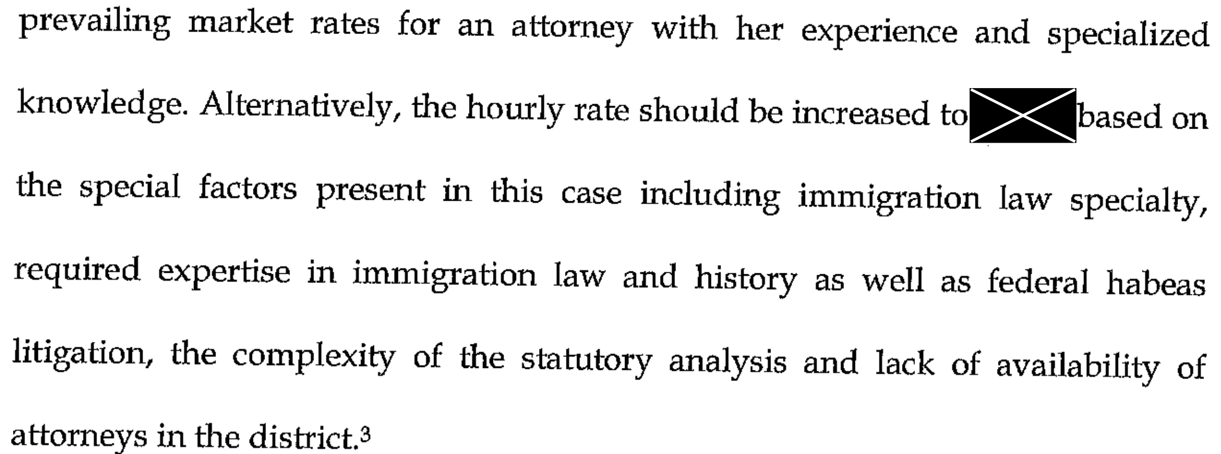
this Motion and accompanying Memorandum of Law. If additional hours are necessary in this case, they will be submitted at the conclusion of the litigation.

VI. CONCLUSION

For the foregoing reasons, and based on the record and authorities cited above, Petitioner respectfully requests that the Court grant this Motion.

Petitioner respectfully requests that the Court award attorneys' fees and costs under 28 U.S.C. § 2412 in the total amount of [redacted] calculated at hourly rates of [redacted] for Attorney Karen Weinstock and [redacted] for Attorney Lauren Fascett—who has 20 years of immigration law and federal litigation experience—based on prevailing market rates and the special factors present in this case. Petitioner contends that these enhanced rates are warranted by counsel's specialized expertise in immigration and federal habeas litigation and the limited availability of similarly qualified counsel in this District. In the alternative, should the Court decline to award rates above EAJA's statutory cap, Petitioner requests that the Court at a minimum award fees at a cost-of-living–adjusted EAJA rate consistent with the CPI-based calculation set forth in the accompanying memorandum.

Respondents' position was not substantially justified and there are no special circumstances that would make the requested award unjust. However, the hourly fee rate should be increased to [redacted] for Attorney Karen Weinstock, based on


prevailing market rates for an attorney with her experience and specialized knowledge. Alternatively, the hourly rate should be increased to based on the special factors present in this case including immigration law specialty, required expertise in immigration law and history as well as federal habeas litigation, the complexity of the statutory analysis and lack of availability of attorneys in the district.[3]

Respectfully submitted this 25th day of March, 2026.

/s/ Karen Weinstock
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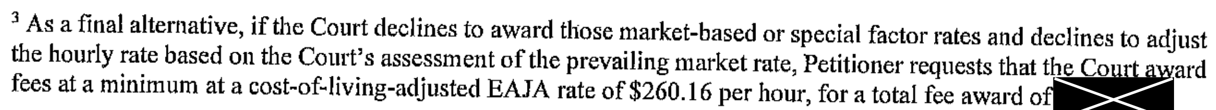
[3] As a final alternative, if the Court declines to award those market-based or special factor rates and declines to adjust the hourly rate based on the Court's assessment of the prevailing market rate, Petitioner requests that the Court award fees at a minimum at a cost-of-living-adjusted EAJA rate of $260.16 per hour, for a total fee award of

CERTIFICATE OF COMPLIANCE

I hereby certify, pursuant to Local Rules 5.1 and 7.1(D), that the filing(s) filed herewith have been prepared using Book Antiqua, 13 point font.

/s/ Karen Weinstock
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CERTIFICATE OF SERVICE

I certify that on March 25, 2026, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system, which will automatically send e-mail notification of such filing to Respondents' attorney(s) of record.

/s/ Karen Weinstock
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